March 11, 2025

MEMORANDUM FOR THE RECORD

From: Joe Barger
NEPA Coordinator

Subject: Categorical Exclusion
Record of Environmental Consideration

Project Title: Cyber Fusion Center

Location: Norwich University
24-48 Park Avenue
Northfield, Vermont 05663

The National Environmental Policy Act (NEPA) and associated implementing regulations (40 CFR Parts 1500-1508) require that all major actions by federal agencies be reviewed with respect to the environmental consequences on the human environment. The National Institute of Standards and Technology (NIST) is providing a congressionally directed funding grant for the Cyber Fusion Center at Norwich University. Consequently, NEPA and the associated implementing regulations apply to this project.

This memorandum provides a Record of Environmental Consideration and summarizes the determination that the Cyber Fusion Center at Norwich University has been found to be categorically excluded from further environmental review under NEPA.

Description of the Action

This project entails the construction and operation a new 13,000 square foot building to house the Cyber Fusion Center at Norwich University. The project includes associated site improvements including access drives, parking, pedestrian walks, landscaping and utility connections.

This new building will be located at 24-48 Park Avenue, on the southeast corner of the Norwich University campus in Northfield, VT. The site is within a fully developed university setting with surrounding academic buildings, athletic facilities, support buildings, pedestrian walkways,

vehicle roadways, parking lots and landscaped elements. Two existing building will be demolished for this project: the 1,200 square foot Hassett House and the 5,500 square foot Communications Building.

The new Cyber Fusion Center building will house the Norwich University Applied Research Institutes, the Office of Strategic Partnership, the main office of the Patrick Leahy School of Cybersecurity and Advanced Computing, and Norwich University Research Centers. Another key feature of the Cyber Fusion Center will be a Security Operations Center. Secret-level classification storage areas and secret communication units will be required.

Required spaces in the new building include:

a. Security Operations Center with backup power and other critical infrastructure to sustain operations in unpredictable weather events and emergency conditions.
b. Welcome center, specifically for Cyber Fusion related events, with a space for guest check-in.
c. Large meeting/conference room area with a plumbed catering area for food preparation and clean-up.
d. Open and flexible workspaces, with networked docking capabilities.
e. Office spaces and unassigned small meeting spaces/offices suitable for visitors and short-term instructors.
f. A minimum of four instructional spaces – oversized flexible teaching/learning spaces.
g. A minimum of two conference rooms.
h. Cyber/Information Warfare laboratory for multiple applications.
i. Maker space for students to co-create with faculty and experts, and a fabrication area for hardware and prototyping.
j. Secret-level classification storage areas.
k. Secure communications infrastructure.

This project will be accomplished in accordance with all applicable state and federal environmental and safety regulations. All applicable regulatory permitting will be obtained.

Specific Considerations of this Action and any Extraordinary Circumstances

- **Existing Site**

The proposed site for the Cyber Fusion Center is within a previously disturbed and fully developed portion of Norwich University. The entire project site, including grading and landscaping areas, is 5 acres.

Phase 1 and Phase 2 Environmental Site Assessments were conducted on the project site. The results are discussed in the Hazardous Materials Section of this memorandum.

No conservation areas or forested areas exist at the project site.

- **Endangered Species and Critical Habitats**

Vermont Fish & Wildlife has inspected the proposed location and confirmed there is no presence of threatened/endangered species or critical habitats.

- **Wetlands, Flooding Potential and Resilience**

According to the United States Fish and Wildlife Service National Wetlands Inventory and the Vermont Agency of Natural Resources there are no known wetlands on or adjacent to the proposed site.

The site is located outside of any 100- and 500-year flood hazard areas (FEMA). The project is located approximately 1600 feet from the Dog River 100-year floodplain and 56.59 feet above this floodplain. Due to the horizontal distance from the flood plain and elevation difference, the project area is not considered to be susceptible to increased flooding from the Dog River that may result from climate change. Further, this area of the campus does not contain streams or drainage ways that would result in flooding events.

- **Stormwater**

Stormwater will be collected by subsurface storm pipes and conveyed to the university's existing subsurface stormwater collection, conveyance and treatment system. An infiltration system will be installed as part of the project stormwater management system to reduce runoff from the project and provide groundwater recharge. The system has been designed to meet State of Vermont Stormwater Management Regulations. A Stormwater Discharge Permit will be obtained from the Vermont Agency of Natural Resources.

Stormwater control measures will be accomplished during construction to control erosion and sedimentation as required by the State of Vermont. These measures will include implementation of State Low-Risk Site Management requirements including isolation of disturbed areas, installation of erosion control/silt control fencing, provision of inlet protection measures and provision of erosion control matting. Permanent surface stabilization will include buildings, paver areas, asphalt pavement, concrete walkways, mulched planting areas, and grassed areas. The erosion and sedimentation control measures have been designed and will be implemented during construction to meet State of Vermont Stormwater Management Regulations. A Stormwater Construction General Permit will be obtained from the Vermont Agency of Natural Resources.

- **Building Staffing/Utilities**

Staffing and student populations are not expected to increase significantly due to the operation of the new building.

Local roadways have capacity for a temporary increase in traffic during construction and for the ongoing increase in traffic expected for staff and students at the new building.

The power requirements of the new facility were coordinated with the Town of Northfield, and they reported to have the capacity to serve the expected electric load. The Town of Northfield will also provide the water supply and wastewater treatment for the new facility.

- **Air Quality/Greenhouse Gas Emissions**

EPA Criteria Air Pollutants and Greenhouse Gas emissions are expected to increase due to the energy requirements of the new building. To mitigate the increased emissions the new building will be developed to meet:

- State of Vermont Commercial Building Energy Efficiency Standards, and
- US Green Building Council LEED Silver Standards.

The proposed building will be heated by energy efficient systems installed under this project. The systems being considered are one, or a combination of, the following systems: a heat pump system, a geothermal well system, and a high efficiency fossil fuel or electric fuel boiler system.

The main air emissions produced by the proposed facility would result from any added heating and cooling load required for the new building. The facility will also be provided with an emergency generator. Use of this generator would be intermittent and used only during emergencies and during infrequent operational tests.

The campus operates under a State of Vermont Air Quality Permit that regulates operation of the steam plant and generators on site.

Energy efficiency requirements for the building and State Air Quality Permit emissions discharge criteria will result in proactive management of emissions from the project.
The following energy conservation measures will be implemented:

- Energy efficient glazing
- Energy efficient building insulation
- Energy efficient lighting
- Energy efficient heating and cooling

- **Hazardous Materials**

Phase I and Phase II Environmental Site Assessments were conducted on the Cyber Fusion Center Site and had the following findings:

- Recognized Environmental Condition (REC) 1: Historical use of the subject property as a car dealership/repair garage between at least 1940 – 1962.
- REC 2: The historical presence of two buried gasoline tanks on the northern portion of the subject property between at least 1940 – 1962 (current presence or absence of these tanks could not be confirmed).
- REC 3: The presence of a heating oil underground storage tank (UST) on the subject property (confirmed by ground penetrating radar).
- REC 4: The historical use of the adjacent lot to the east of the Cyber Fusion Center site as a gasoline filling station. This area (the Former Lemery's Store Site) is currently being managed as a hazardous site under the State Sites Management program. Extensive petroleum impacts have been documented and remedial actions completed on this property.
- Groundwater flow is to the west and northwest.
- No contamination was detected in the soil, soil gas or groundwater at the Cyber Fusion Center Site.

To address the above findings, a Soil Management Plan (SMP) was prepared by KAS Environmental Science and Engineering, dated March 7, 2025, that will be implemented before and during the Cyber Fusion Center site development. The SMP includes the following:

- Location, excavation and removal of USTs on the Cyber Fusion Center site.
- Screening of soils to identify petroleum contaminants. Removal and proper disposal of any contaminated soils found.
- Proper removal and closure of specified monitoring wells.

The existing buildings on the project site, the Hassett House and the Communications Building, were tested for asbestos and lead. The testing results found no asbestos or lead detected at concentrations above regulatory standards.

During construction and post construction, any hazardous materials found or generated at the project site will be handled and disposed in accordance with state and federal regulations.

- **Historic/Cultural Significance**

The project site at 24-28 Park Avenue contains the following historic structures: the Communications Building at 24-48 Park Avenue consisting of the Brown Farm House, the Northfield Town House and a connecting structure; and the Hassett House at 48 Park Avenue. The buildings have been renovated numerous times over the years to meet university academic requirements. The buildings have been used for several years as

university classrooms, offices and operational spaces. The proposed project would require demolition and removal of these structures with mitigation as determined by consultation with State Historic Preservation Officer (SHPO) and NIST.

Working with the Vermont SHPO staff for over a year, NIST has separately determined the following:

1. None of the three existing structures are eligible for listing in the National Registry of Historic Places,

2. There are no known below grade resources based upon a Phase 1 Archeological survey of the area of potential effect, as well as a subsequent ground penetrating radar survey of the area to be disturbed.

3. Based on available information, no historic properties are affected by this project.

This determination has been coordinated with the Vermont SHPO (attachment A).

In the event that archeological materials are found during the construction of this project, Norwich University will stop work at the site and consult with NIST and the Vermont SHPO on procedures to proceed.

- **Environmental Justice**

Due to nature of the project and the proposed site location, this project is not expected to have disproportional adverse human health or environmental impacts to overburdened and underserved communities, including minority, Tribal, or low-income populations.

The project is located on the existing campus of Norwich University in the established community of Northfield, Vermont.

Northfield is a vibrant college town community. It does not meet any burden thresholds or associated socioeconomic thresholds identified for overburdened and underserved communities as identified using the Council on Environmental Quality's Climate and Economic Justice Screening Tool. (https://screeningtool.geoplatform.gov/en/about#3/33.47/-97.5). Further, the screening tool demographic data does not indicate that any minority, tribal, or low-income populations in the Town that may be impacted disproportionately.

The community is aware of the project through numerous local and State conversations, newspaper articles and Town website posts. For example, on Jan 20, 2023, the Town of Northfield shared our news story on their News tab: News (northfield-vt.gov). The building

was announced briefly at the Northfield Economic Development Subcommittee meeting in early spring and listed in the minutes. Norwich University former President Dr. Mark Anarumo presented the proposed project to the Norwich community in a town hall on April 12, 2023. A public hearing presentation on the project was presented to the Town Selectboard on October 25, 2023 and May 14, 2024. A public hearing at the Development Review Board was held on May 23, 2024.

Effects of the Action

No significant adverse impacts on the environment are expected from this action.

Categorical Exclusion

The activities associated with this project fall within the criteria of the following Department of Commerce Categorical Exclusion (CATEX):

> A–2, New construction upon or improvement of land where all of the following conditions are met:
> (a) The site is in a developed area and/or a previously disturbed site,
> (b) The structure and proposed use are compatible with applicable Federal, Tribal, State, and local planning and zoning standards and consistent with Federally approved State coastal management programs,
> (c) The proposed use will not substantially increase the number of motor vehicles at the facility or in the area,
> (d) The site and scale of construction or improvement are consistent with those of existing, adjacent, or nearby buildings, and
> (e) The construction or improvement will not result in uses that exceed existing support infrastructure capacities (roads, sewer, water, parking, *etc.*). This CE does not apply where the project must be submitted to the National Capital Planning Commission (NCPC) for review and NCPC determines that it does not have an applicable Categorical Exclusion. DOC is not a major land managing agency in the Federal government. Department activities involving new construction or improvements of land typically involve single buildings and supporting infrastructure in a single locality. Any potential for environmental impacts would be of a small scale and confined to more localized impacts.

The proposed project meets the criteria of CATEX A-2 as follows:

(a) The proposed site has been disturbed during previous construction of university buildings.
(b) Located on the campus of the University of Norwich, the project is compatible with applicable Federal, Tribal, State, and local planning and zoning standards.

(c) Increases in the number of motor vehicles at the facility or in the area are not expected to be significant.
(d) The proposed new building will not result in uses that exceed existing infrastructure capacities. The project does not require review by the NCPC.

The proposed project: Cyber Fusion Center at Norwich University is categorically excluded from the need for further environmental review under NEPA. Any changes to the above project will require additional NEPA review.

JOSEPH BARGER Digitally signed by JOSEPH BARGER Date: 2025.03.11 12:49:20 -04'00'

3/11/2025

Joe Barger
NIST NEPA Coordinator

Date

ROBERT VAUGHN Digitally signed by ROBERT VAUGHN Date: 2025.03.12 07:17:21 -04'00'

Robert C. Vaughn
NIST Chief Facilities Management Office

Date

Attachment A, Correspondence with the State Historic Preservation Officer

NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY
U.S. DEPARTMENT OF COMMERCE

2024 June 27

Ms. Laura V. Trieschmann
State Historic Preservation Officer
One National Life Drive
Deane C. Davis Building, 6th Floor
Montpelier, VT 05620-0501

Re: Norwich University Cyber Fusion Education Center

Dear Ms. Trieschmann:

The National Institute of Standards and Technology (NIST), an agency of the U.S. Department of Commerce in accordance with the National Historic Preservation Act of 1966 (as Amended) and its implementing regulations 36 CFR 800 is administering a grant to Norwich University for the design and construction of a new Cyber Fusion Education Center in accordance with the terms of the Consolidated Appropriations Act of 2023 [Public Law 117-328]. The project involves the construction of a new 13,000 sq. ft. facility to be located on a portion of the campus that contains three 19th century structures. NISTs evaluation of the affected area (above and below grade resources) by SOI qualified architectural historians and archeologists in 2023 and 2024 has resulted in a determination of no eligible historic resources following careful application of the National Register Criterion 1 -4.

Working with your staff over the course of the year, NIST has separately determined that:
1) none of the three existing structures are eligible for listing in the NRHP
2) there are no known below grade resources based upon a Phase I archeological survey of the potential APE as well as subsequent GPR Survey of the areas to be disturbed.

In summary, since no historic properties are affected by this Undertaking as defined within 36 CFR 800.3 (a) (1), NIST has concluded its Section 106 compliance responsibilities for this project.

Please also understand that while no NRHP eligible properties have been documented, NIST has required of the University that in the event archeological materials are encountered as a result of soil disturbance, work shall be halted and NIST, the University

and SHPO shall consult on procedures to follow to determine the National Register eligibility of archaeological resources and to evaluate the potential for adverse effects of the Project on such resources.

Should you have questions or concerns, please reach out to TaJonique Martin at tajonique.martin@nist.gov or at (240)255-0207

Sincerely,

Phillip W. Neuberg

Phillip Neuberg, FAIA
Federal Preservation Officer

Enclosures: 1) Ground Penetrating Radar Survey
2) Phase I Archeological Investigation

CC: Devin Colman, VT SHPO
Yvonne Basque, VT SHPO
Robert Slocum, NIST

* *Sent electronically**